

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In re: U LOCK INC. a/k/a U-LOCK INC.)	
)	Bank. 22-20823-GLT
)	
Debtor.)	Chapter 7
)	
-----)	
SHANNI SNYDER,)	
)	
Movant,)	
)	
v.)	FILED
)	7/22/2022 3:51pm
WILLIAM OTTO, and)	CLERK
CHRISTINE BIROS,)	U.S. BANKRUPTCY
)	COURT - WDPA
Respondents.)	
_____)	

MOTION TO COMPEL WILLIAM OTTO TO FILE APPEARANCE

Creditor Shanni Snyder ("Snyder") files this, her Motion to
Compel William Otto to file appearance:

1. Creditor Snyder conferred with counsel for Christine Biros by sending an email to Attorney S. Wenrich and to W. Otto on July 16, 2022.
2. They chose not to respond.
3. During both hearings in this case, William Otto argued as counsel for Christine Biros. He is not part of the Bernstein law firm that appeared in this case.
4. A review of the PACER docket shows that Mr. Otto is not listed

as an attorney.

5. Mr. Otto's name and signature does not appear anywhere on Ms. Biros' original motion, so the exemption in Local Rule 9010-2(a) does not apply.
6. Federal Rule of Bankruptcy Procedure 9010(b) requires that Mr. Otto file an appearance in this case.
7. Otherwise, his participating and arguments to this Court should not be allowed.

WHEREFORE, Creditor Shanni Snyder respectfully requests that this Court enter an Order directing the appearance of William Otto as co-counsel for interested party Christine Biros.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Shanni Snyder', is written over a light gray rectangular background.

Shanni Snyder
14390 Route 30
North Huntingdon PA 15642
shannis@pm.me
(412) 218-1750

PETITIONING CREDITOR

William Otto's failure to comply with Bankruptcy Rule 9010(b).

From Shanni S. <shannis@pm.me> To
Charles Zebley <COZ@zeblaw.com>
Denise Hixson <robertslone223@gmail.com>
J. Allen Roth <lawmatters@yahoo.com>
swenrich@bernsteinlaw.com
mahady@pulsenet.com
weo@ottolawfirm.com

Date Saturday, July 16th, 2022 at 4:25 PM
Dear Parties:

I have looked at the docket, and I cannot find William Otto's appearance anywhere for Christine Biros. His name is not on the original motion Ms. Biros filed, so L.R. 9010-2(a) does not seem to apply. Compliance with Bankruptcy Rule 9010(b) appears prudent.

Can Mr. Otto file a notice of appearance so he can comply with Rule 9011?

I hope this can be resolved without having to ask the judge to make him file an appearance.

Thanks,
Shanni Snyder
Creditor

Motion to Compel William Otto to appear

From Shanni S. <shannis@pm.me>
To weo@ottolawfirm.com
,swenrich@bernsteinlaw.com
Date Wednesday, July 20th, 2022 at 2:19 AM
Dear Counsel:

I hoped that Mr. Otto would appear in the case so we did not need to bother the judge with this. I will mail the attached at 4:00 p.m. to the Clerk unless Mr. Otto appears or agrees to do so.
Shanni

CERTIFICATE OF FILING AND SERVICE

I, Shanni Snyder, certify that all participants to this case have joined the Court's Electronic Case Filing Service and will receive a copy of this document and the attached exhibits through that system and notification when the document is filed. I have served the persons on the attached matrix that have not appeared on this 22nd day of July, 2022.

In addition, I certify that I filed this document through the electronic filing system on the bankruptcy court's website.

A handwritten signature in black ink, appearing to read 'Shanni Snyder', is written over a light gray rectangular background.

Shanni Snyder